

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to
Advance Demand Flexibility Through
Electric Rates

Rulemaking 22-07-005

MOTION FOR PARTY STATUS OF TESLA, INC.

Damon Franz
Managing Policy Advisor
Tesla, Inc.
901 Page Avenue
Fremont CA, 94538
E-mail: dfranz@tesla.com

June 1, 2023

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I. INTRODUCTION

Pursuant to Rules 1.4(b) and 11.1 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Tesla, Inc. ("Tesla") hereby moves for party status in the above-captioned proceeding. Below, Tesla explains its interest in the proceeding and some of the factual contentions that Tesla intends to make in the proceeding.

II. COMPLIANCE WITH RULE 1.4

Commission Rule 1.4 (b) requires that a person seeking party status by filing a motion to become a party to do the following:

- (1) fully disclose the persons or entities in whose behalf the filing, appearance or motion is made, and the interest of such persons or entities in the proceeding; and
- (2) state the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented

In compliance with Commission Rule 1.4 (b), Tesla states the following:

A. Identity of Tesla

Tesla is manufacturing company started in California with a mission to accelerate the world's transition to sustainable energy. In the service of this mission, Tesla has dedicated itself to electrifying

transportation through the manufacture and sale of advanced electric vehicles as well as key clean energy technologies, including battery storage and solar photovoltaic systems. By electrifying the transportation sector and decarbonizing electricity production, substantial progress can be made in addressing climate change and the serious threat it poses, recognizing the significant share of greenhouse gas emissions that are directly attributable to the transportation and energy sectors. Tesla has produced more than 4 million electric vehicles worldwide, installed more than 20 gigawatt-hours (GWh) of stationary battery storage capacity, and has deployed more than three gigawatts (GW) of solar photovoltaic panels.

B. Tesla's Interest in this Proceeding

Tesla manufactures a suite of products that allow consumers to drastically reduce the greenhouse gas (GHG) footprint of their everyday lives, including electric vehicles (EVs), rooftop solar panels, and in-home battery energy storage. Our residential battery, the Powerwall, is a 5kW/13.5kWh Lithium-Ion battery capable of providing a number of services, including solar self-consumption, response to time-of-use (TOU) rates, and aggregation into a Virtual Power Plant (VPP) for remote dispatch and reliable response to grid needs.

The benefits to customers, the electric grid and the environment of the consumer products Tesla sells are dependent on retail electric rates. For example, the cost of charging an EV, as well as the associated emissions and grid impact, is highly dependent on charging behavior that is linked to the drivers' retail rate structure. Likewise, the customer, grid and environmental benefits of our Powerwall battery and solar panels depend on how these products are operated, which in turn depends on retail rate structures and associated policies, like demand response. For these reasons, Tesla has a strong interest in both Track A (income-graduated fixed charges) and Track B (retail rate design for demand flexibility) of Rulemaking 22-07-005.

If granted party status, Tesla intends to advocate on policy issues related to retail rate design and fixed charges, including the structure of a dynamic rate like CalFUSE, methods and processes for communicating that rate to aggregators and customer devices, and other relevant issues.

III. SERVICE

For the purpose of receipt of all correspondence, pleadings, orders and notices in this proceeding, the following Tesla representative should be placed on the service list as a “party.”

Damon Franz
Managing Policy Advisor
Tesla, Inc.
901 Page Avenue
Fremont CA, 94538
Telephone: 650-339-6091
E-mail: dfranz@tesla.com

IV. CONCLUSION

Tesla’s participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of issues in the proceeding. For the reasons stated above, Tesla requests the Commission grant Tesla’s Motion for Party Status.

Respectfully submitted,

/s/ *Damon Franz*

By: Damon Franz
Managing Policy Advisor
Tesla, Inc.
901 Page Avenue
Fremont CA, 94538
Telephone: 650-339-6091
E-mail: dfranz@tesla.com

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